

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: : CHAPTER 13  
Karen McMullen :  
 :  
Debtor : BANKRUPTCY NO.: 16-17332-AMC

**RESPONSE TO MOTION FOR RELIEF**

Debtor, by her attorney, Brandon J. Perloff, Esq. by way of Response to Movant's Motion, respectfully represents the following:

1. Admitted
2. Admitted.
3. Admitted
4. Denied. By way of further response, the Debtor intends to cure any post-petition delinquency that may be due at this time. To the extent that Movant's averment is a conclusion of law, no response is required.
5. Denied. By way of further response, the Debtor intends to cure any post-petition delinquency that may be due at this time.
6. Denied. By way of further response, the Debtor intends to cure any post-petition delinquency that may be due at this time.
7. Denied. The Debtor lacks the requisite knowledge to attest to the veracity of this allegation.
8. Denied. To the extent that Movant's averment is a conclusion of law, no response is required.
9. Movant's averment does not call for a response.

WHEREFORE, Debtor prays that the Movant's request for relief be denied.

Respectfully submitted,

/s/ Brandon J. Perloff  
Brandon J. Perloff Esquire.  
Attorney for Debtor

Date: May 30, 2017